## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 7

IRENE MULKERIN : CASE NO.: 1:24-bk-03264-HWV

Debtor.

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IRENE MULKERIN

Debtor/Objector

VS.

ORRSTOWN BANK :

Respondent.

## MOTION FOR LEAVE OF COURT TO PROVIDE REMOTE TESTIMONY

AND NOW, comes Orrstown Bank ("Movant" or "Orrstown"), by and through its attorneys, JSDC Law Offices, files this Motion for Leave of Court to Provide Remote Testimony, averring as follows:

- 1. Movant is a lending institution duly authorized to conduct business in the Commonwealth of Pennsylvania and is a party-in-interest under the provisions of the Bankruptcy Code as it is a secured creditor of the Debtor Irene Mulkerin ("Debtor").
  - 2. On April 11, 2025, Debtor filed an Objection to Orrstown's Proof of Claim.
  - 3. Orrstown filed an Answer to the Objection to Orrstown's Proof of Claim.
- 4. The Court has scheduled a hearing on the Objection to Orrstown's Proof of Claim on May 29, 2025 at 9:30AM.
- 5. Movant respectfully requests leave of court to present testimony by the bank's representative via remote appearance, if necessary.
- 6. It is anticipated any testimony by Orrstown will be brief and solely to verify the proof of claim figures, and Orrstown's primary office location is in Hagerstown, Maryland, thus cause exists due to distance.

- 7. The undersigned sought concurrence of Debtor, who does not concur with this Motion.
- 8. The undersigned counsel for Orrstown intends to register to participate remotely as well, if the Court grants the foregoing Motion for Leave of Court to Provide Remote Testimony, and if such leave of court is granted, counsel for Movant will file the appropriate registration in advance of the hearing on May 29, 2025 at 9:30AM.

WHEREFORE, Movant respectfully requests that the Court enter the appropriate Order granting Leave of Court for Movant to Provide Remote Testimony.

Respectfully submitted,

JSDC LAW OFFICES

Date: May 22, 2025 BY: /s/ Kimberly A. Bonner, Esquire

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